

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: RAILWAY INDUSTRY) Master Docket Misc. No. 18-798
EMPLOYEE NO-POACH ANTITRUST)
LITIGATION) MDL No. 2850
This Document Relates to:)
ALL ACTIONS)

**PLAINTIFFS' MOTION FOR FINAL APPROVAL OF
PROPOSED CLASS ACTION SETTLEMENTS**

Plaintiffs respectfully move the Court for an order to: (1) finally approve the terms of the Settlements dated October 16, 2019 with the Knorr Defendants and February 24, 2020 with the Wabtec Defendants as fair, reasonable, and adequate; (2) grant final certification of a Settlement Class pursuant to Rules 23(a), (b)(3), and (e) of the Federal Rules of Civil Procedure; (3) finally approve the plan of allocation proposed by Plaintiffs; and (4) authorize the distribution of the Settlement Funds as specified in the Settlement Agreements, including for the purpose of paying out claims and, as discussed in Plaintiffs' Memorandum of Law In Support of Motion for Attorneys' Fees, Costs, and Service Awards (Dkt. 271), for disbursement of attorney's fees, costs, service awards, and the cost of settlement administration.

Defendants do not oppose this motion.

In further support of this Motion, Plaintiffs submit the accompanying memorandum of law; the Joint Declaration of Dean M. Harvey and Roberta D. Liebenberg, and attached exhibits; and the Declaration of Derek Smith, and attached exhibits.

Plaintiffs respectfully request that their Motion be granted.

Dated: July 17, 2020

Respectfully submitted,

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